

Plaintiff United States Securities and Exchange Commission (“SEC”) respectfully files this motion to compel discovery against Defendants John M. Fife, Chicago Venture Partners, L.P., Iliad Research and Trading, L.P., St. George Investments LLC, Tonaquint, Inc., and Typenex Co-Investment, LLC (collectively, “Defendants”). In support of this motion, the SEC states as follows:

1. Defendants have refused to produce emails responsive to Request Nos. 2, 4, 7, 8, 12, 18, and 30 in the First Set of Document Requests that the SEC propounded to Defendants, pursuant to Federal Rules of Civil Procedure 26 and 34.

2. Additionally, Defendants have refused to provide responsive answers to Request to Admit No. 1 and every other odd-numbered Request to Admit through Request No. 209 in the First Set of Requests to Admit that the SEC propounded to Defendants, pursuant to Federal Rules of Civil Procedure 26 and 36.

3. Accordingly, the SEC respectfully moves this Court to compel Defendants to provide this discovery, which is relevant and proportional to the needs of the case.

4. In accordance with Local Rule 37.2, counsel for the SEC telephonically conferred with counsel for the Defendants on July 19, 2022, August 18, 2022, August 25, 2022, September 8, 2022, and September 19, 2022, in a good-faith effort to resolve the differences raised in this motion, but were unable to reach an accord.

5. The SEC is contemporaneously filing a Memorandum in Support of this motion, with exhibits thereto.

WHEREFORE, the SEC respectfully requests that the Court: (i) grant this Motion in its entirety; (ii) order Defendants to produce emails responsive to Request Nos. 2, 4, 7, 8, 12, 18, and 30 in the SEC's First Set of Document Requests; (iii) order Defendants to provide responsive answers to Request to Admit No. 1 and every other odd-numbered Request to Admit through Request No. 209 in the SEC's First Set of Requests to Admit; and (iv) grant such other and further relief as this Court deems just.

Dated: October 21, 2022

Respectfully submitted,

**UNITED STATES SECURITIES AND
EXCHANGE COMMISSION**

/s/ Eric M. Phillips

By: One of Its Attorneys

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on October 21, 2022, he caused the foregoing document to be electronically filed with the Clerk of the United States District Court for the Northern District of Illinois, Eastern Division, using the Court's CM/ECF system, which shall send notification of such filing to the following counsel of record:

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